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**From:** John Montgomery-Brown [jmontgomery-Brown@ekiconsult.com]  
**Sent:** 6/22/2021 8:16:04 PM  
**To:** Schulman, Michael [Schulman.Michael@epa.gov]  
**CC:** Zachary Salin [zsalin@ekiconsult.com]; Fuoco, Angie [Fuoco.Angie@epa.gov]  
**Subject:** RE: TCE in Outdoor Air and the AMD/TRW Microwave Superfund Site

Hi Michael,

Thanks for talking with me a couple of weeks ago. Is the redacted VI Work Plan for the Offsite Operable Unit available yet? Also, I remember talking about the fact that the Figure 5 of the 5<sup>th</sup> Year report was flawed in that it lacked details about where the data were collected and such. While the analytical data for the outdoor air samples is presented in the Technical Memorandum regarding Vapor Intrusion Data Review – Residential Buildings (prepared by Aptim Federal Services, LLC and dated 2019-02-05), this document doesn't contain any information regarding where the outdoor air samples were collected. Do you have this information and if so, can you share it? (as this is just for the outdoor air sampling locations, it doesn't seem like it should contain PII).

Thanks!

JMB

**John Montgomery-Brown, Ph.D.**

Senior Engineer / Chemist

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**From:** Schulman, Michael <Schulman.Michael@epa.gov>  
**Sent:** Monday, June 07, 2021 3:02 PM  
**To:** John Montgomery-Brown <jmontgomery-Brown@ekiconsult.com>  
**Cc:** Zachary Salin <zsalin@ekiconsult.com>; Fuoco, Angie <Fuoco.Angie@epa.gov>  
**Subject:** RE: TCE in Outdoor Air and the AMD/TRW Microwave Superfund Site

Hi John,

Attached is the May 5, 2020 Signetics Vapor Work Plan which you requested with EPA comments and response to comments. Note that the Signetics Site groundwater treatment system air emissions from the GWTS are monitored and covered under an existing BAAQMD permit to operate.

The Updated Removal Work Plan for the Offsite Operable Unit was finalized in November 2020 incorporating EPA comments. The Work Plan also addresses the scope of the outdoor air evaluation. The work plan includes personally identifiable information (PII), which will need to be redacted. I will send you a copy of the work plan once that has been completed.

An outdoor air evaluation was conducted last February (2021) under a work plan addendum. The addendum includes PII and once that has been redacted I'll send you copy of it as well.

Thank you,  
Michael

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**Michael Schulman**

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**From:** John Montgomery-Brown <jmontgomery-brown@ekiconsult.com>  
**Sent:** Friday, June 4, 2021 3:05 PM  
**To:** Schulman, Michael <Schulman.Michael@epa.gov>; Fuoco, Angie <Fuoco.Angie@epa.gov>  
**Cc:** Zachary Salin <zsalin@ekiconsult.com>  
**Subject:** TCE in Outdoor Air and the AMD/TRW Microwave Superfund Site

Michael and Angie:

I recently reviewed the Fifth 5-Year Review Report for the AMD/TRW Microwave Superfund Site (the "Fifth 5-Year Review Report", attached) prepared by the US Army Corps of Engineers on behalf of USEPA (Region IX) and was surprised by the (1) consistent presence of trichloroethene ("TCE") in ambient/outdoor air samples in Sunnyvale, California (see Figure 5 of the Fifth 5-Year Review Report) at concentrations that are significantly above the 2011-2013 background concentrations measured in Cupertino and San Jose (attached) and (2) the fact that a number of the reported outdoor air concentrations are greater than the residential Regional Screening Level ("RSL") for TCE in indoor air (0.48 micrograms per cubic meter or ug/m3).

The Fifth 5-Year Review Report states the following (emphasis mine) with respect to the reported outdoor air concentrations presented in Figure 5:

*"Sampling of ambient outdoor air (which occurs during each indoor air sampling event) has occurred regularly in the Offsite OU since January 2015. **The results of this outdoor air sampling have shown varying levels of TCE with a general upward trend. Data received more recently in May 2019 from Philips showed outdoor air TCE levels of up to 3.6 µg/m3 during the October 2018 and January 2019 sampling events at the Signetics Site (where the treatment system for the AMD and TRW sites and Offsite OU TCE groundwater plume is located and where a sub-slab depressurization system has recently been installed at a commercial-type building.** (Figure 6) While the highest outdoor air TCE measurements have generally been observed in the November – January timeframe, **these spikes appear to be increasing over time.**"*

Based on these data, the Fifth 5-Year Review Report recommended additional investigation of the "contributions to outdoor air TCE levels from fugitive emissions from the groundwater treatment system and emissions from the vapor intrusion mitigation systems" for the Offsite OU. Are there any documents or results available for this investigation? If so, I would greatly appreciate it if you could send them to me for review.

Also, in reviewing the 2018 settlements for the Signetics Site (Triple Site) and the Offsite Operable Unit (Triple Site), Appendix C (the Statements of Work) indicates that the Responsible Parties are to prepare a Vapor Work Plan for the Signetics Site and an Updated Removal Work Plan for the Offsite Operable Unit. If you could send me these documents (or the results of these investigations), I'd greatly appreciate it.

Thanks!

JMB

**John Montgomery-Brown, Ph.D.**

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